

AB:AS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

PARWINDER SINGH,

Defendant.

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COMPLAINT

(18 U.S.C. § 1201(a))

Case No.

23 M 833

EASTERN DISTRICT OF NEW YORK, SS:

ALEXANDER PANOS LOIZIAS, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about September 14, 2023, within the Eastern District of New York and elsewhere, the defendant PARWINDER SINGH, knowingly and unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, or carried away and held for ransom or reward or otherwise, a person, when the person was willfully transported in interstate or foreign commerce, and the defendant traveled in interstate or foreign commerce or used the mail or any means, facility, or instrumentality of interstate or foreign commerce in committing or in furtherance of the commission of the offense; to wit, SINGH kidnapped a victim, whose identity is known to the deponent, in Brooklyn, New York and unlawfully transported her to New Jersey.

(Title 18, United States Code, Section 1201(a))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have been a law enforcement officer for three years. I am assigned to the Joint Bank Robbery and Violent Crimes Task Force, which is responsible for investigating, among other things, kidnappings and other violent crimes.

2. I am familiar with the facts and circumstances set forth below from, among other things, my participation in the investigation; my review of the investigative file; reports of other law enforcement officers involved in the investigation; and conversations with the victim, who resides in Brooklyn, New York (the "Victim").

3. The Victim met the defendant PARWINDER SINGH in Brooklyn, New York between February and March 2023. At the time, the Victim and SINGH lived in the same neighborhood in Brooklyn. After meeting, the Victim and SINGH communicated by messaging apps, including WhatsApp; social media, including Instagram; and other means.

4. In April 2023, the Victim ended communications with SINGH. In response, SINGH came to her house uninvited, struck the Victim, and pushed her to the ground. The Victim did not file a police report after that assault.

5. Despite the Victim ending communications, SINGH continued to contact her, sending harassing and threatening messages and calling her repeatedly. The Victim blocked SINGH's number on multiple occasions, but each time, SINGH would call and message

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware. Any information relayed herein from the Victim is described in sum and substance and in part.

her from new numbers. SINGH also would show up to the Victim's place of work to try to communicate with her.

6. SINGH further harassed the Victim's relatives, calling her father repeatedly and demanding to see her.

7. On May 25, 2023, SINGH was charged by the Queens County District Attorney with (i) assault in the second degree with intent to cause physical injury with a weapon or instrument, (ii) assault in the second degree with intent to cause physical injury, (iii) criminal possession of a weapon in the fourth degree with intent to use, and (iv) harassment in the second degree with physical contact. These charges arose from a May 9, 2023 altercation where SINGH allegedly assaulted another individual with a cricket bat. Thereafter, SINGH moved to North Carolina, but has been traveling to New York for court appearances.

8. Prior to a September 14, 2023 court appearance on his assault charges, SINGH traveled by commercial flight from North Carolina to New York on September 13, 2023.

9. On September 13, 2023, SINGH sent harassing and threatening messages to the Victim. For example, SINGH threatened to vandalize the Victim's father's car and to set a car in the Victim's neighborhood on fire. The Victim and her parents reported that her father's car was vandalized, and the New York City Police Department received a 911 call regarding a car that had been set on fire in the Victim's neighborhood on September 13, 2023.

10. In the evening of September 13, 2023, the Victim left her home in Brooklyn, New York to attend a party. The Victim received a ride home and was dropped off at the corner of the block where her home is located at approximately 4:00 a.m. on September 14, 2023.

11. As the Victim walked home, SINGH confronted the Victim, shoved her to the ground, struck her multiple times on her head, and then forced her into the passenger seat of a nearby vehicle, a yellow taxi van with license plate number Y206221C. An associate of SINGH'S was seated in the backseat. SINGH got into the driver's seat and drove the Victim against her will out of Brooklyn.

12. As he was driving, SINGH threatened the Victim, telling her that he planned to sexually assault her once his associate left them alone. While the Victim was unlawfully confined in the vehicle, SINGH forcibly groped the Victim's genital area over her clothes and tried to forcibly kiss her.

13. At one point, SINGH and his associate stopped at a gas station. The Victim exited the car and tried to escape. She approached a nearby individual for help, but SINGH and his associate intervened, grabbing her and forcing her back into the vehicle.

14. In the early morning on September 14, 2023, a yellow taxi van with license plate number Y206221C was identified by license plate readers as the van drove on the Belt Parkway Westbound in Brooklyn and over the Verrazano Bridge from Brooklyn to Staten Island. SINGH and his associate then drove the Victim into New Jersey.

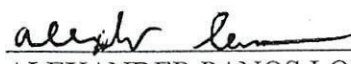
15. At points during the drive from the Eastern District of New York to New Jersey, SINGH permitted the Victim intermittent and brief access to her phone. The Victim used that access to message her brother that she was being held against her will. The Victim shared her phone's location with her brother, who used that information to call local police in New Jersey.

16. Members of the Woodbridge Police Department in New Jersey dispatched a police officer for a welfare check to that location, which was in Woodbridge Township, New

Jersey, where they found the Victim, SINGH and his associate in the taxi van. The Victim had visible injuries to her head, elbow, and knees. She identified SINGH as the person who had abducted her in Brooklyn and drove her to New Jersey.

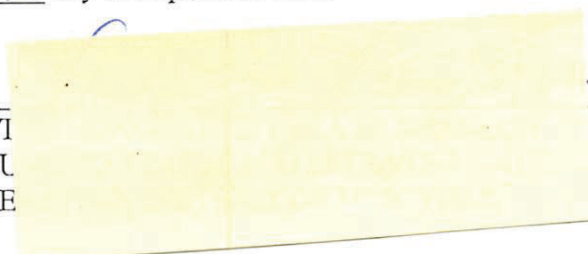
17. SINGH was subsequently placed under arrest.

WHEREFORE, your deponent respectfully requests that the defendant PARWINDER SINGH be dealt with according to law.



ALEXANDER PANOS LOIZIAS
Special Agent
Federal Bureau of Investigation

Sworn to before me this
15 day of September 2023


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